

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re: ARC AIRBAGS INFLATORS
PRODUCTS LIABILITY LITIGATION

ALL CASES

Case No.: 1:22-md-03051-ELR

MDL No. 3051

**NOTICE OF COMPLETION
OF BRIEFING ON
DEFENDANTS' MOTIONS
TO DISMISS**

Plaintiffs write to inform the Court that all pending motions to dismiss in this case are now fully briefed. All Defendants, including the foreign Defendants served under the Hague Convention, have moved to dismiss. The domestic Defendants' Rule 12(b)(6) motions have been fully briefed since February 16, 2024. Briefing on the foreign Defendants' Rule 12(b)(2) and 12(b)(6) motions was completed on May 2, 2025. Additionally, briefing on Plaintiffs' related motions for jurisdictional discovery was completed on May 16, 2025.

Discovery has been stayed for nearly two years since Plaintiffs filed their consolidated complaint. *See* NDGa L.R. 26.2(A); Dkt. 91, at 2. In the meantime, many Plaintiffs and likely millions of putative Class Members continue to own vehicles that, according to the country's auto safety regulator, "pose[] an unreasonable risk of serious injury or death to vehicle occupants." Dkt. 267, at 2 (quoting Dkt. 267-1, at 63,474). Plaintiffs are eager to pursue their claims and

obtain relief for themselves and the Class. To that end, we remain available to address the pending motions at oral argument or to participate in a status conference so the parties can discuss next steps in these proceedings, including potentially lifting the stay of discovery.

Dated: May 20, 2025

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CERTIFICATE OF SERVICE

I hereby certify that on this day I caused a true and correct copy of the foregoing document to be filed with the clerk's office by this Court's CM/ECF system, which will serve a true and correct copy of the same upon all counsel of record.

This 20th day of May, 2025.

/s/ David Stellings
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*Counsel for Plaintiffs and the Proposed
Classes*